

Waste Mangement Plan

**Primoshield: 6-33-027
Remedial Investigation/
Feasibility Study
1212 St. Vincent St.
Utica, New York**

January 1998



O'BRIEN & GERE
ENGINEERS, INC.

439432

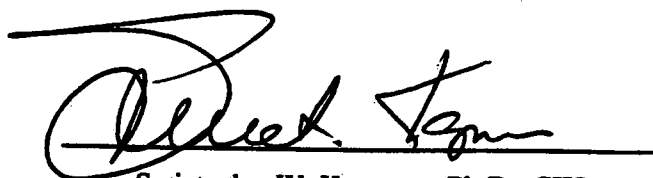


Waste Management Plan

**Primoshield: 6-33-027
Remedial Investigation/Feasibility Study
1212 St. Vincent Street
Utica, New York**

**Title III Project
NYSDEC Region 6, Oneida County**

**Prepared for:
The City of Utica &
NYSDEC, DER, BCRA**



**Swiatoslav W. Kaczmar, Ph.D., CIH
Vice President**

January 1998



**5000 Brittonfield Parkway
PO Box 4873
Syracuse, New York 13221**

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1. Introduction

This Waste Management Plan (WMP) describes the waste management procedures utilized for wastes generated during completion of the Remedial Investigation (RI) conducted by O'Brien & Gere and its subcontractors on behalf of the City of Utica at the Primoshield Site in Utica, New York (the "Site"). The Site (as shown in Figure 1) is owned by the City of Utica and is listed as a Class 2 inactive hazardous waste site by the State of New York (Site Code 6-33-027). Eligible costs associated with the RI have been reimbursed to the City at 75% under Title 3 of the 1986 Environmental Quality Bond Act (EQBA). Funding was formally established in New York State Assistance Contract #C300241 between the City and the New York State Department of Environmental Conservation (NYSDEC) in 1991.

The objective of the WMP is to document waste handling and disposal activities that took place during completion of the RI. RI activities are presented in detail in the Work Plan (O'Brien & Gere, 1992), and Field Sampling Plan (O'Brien & Gere, 1993). The WMP, originally issued in draft form in 1993, is designed to complement the Work Plan and Field Sampling Plan; therefore, it is recommended that this document be reviewed in conjunction with these plans.

The reviewer should note that the intent of the draft and final plan versions are different. The draft plan was designed to identify waste management and disposal practices that were to be conducted by or under the oversight of O'Brien & Gere as engineering consultant to the City of Utica. However, since the City of Utica is no longer the project lead, O'Brien & Gere will no longer act in this capacity. Consequently, O'Brien & Gere cannot assume responsibility for future waste management and disposal at the Site. It is assumed, however, that future activities of this nature will be performed in a manner consistent with the procedures outlined in this plan and the directions of NYSDEC.

This WMP addresses the following issues as they relate to waste management and disposal:

- Site access
- Site security
- Contingency procedures
- Management responsibilities
- Waste disposal

2. Site access

Access to the Site and adjoining properties were required during implementation of the RI. Most of the activities were conducted on the actual Site, which consists of the Primoshield property and the DePaul parking lot (Figure 1).

Access agreements were obtained for the following adjoining properties:

1206 Conkling Ave.	(residence)
1208 Conkling Ave.	(residence)
1214-1216 Conkling Ave.	(residence)
1215 Conkling Ave.	(residence)
1225-1227 Conkling Ave.	(residence)
Book 2, Map 16, Block 3, Lot 19	(vacant lot)
Vacant Lot 4	(vacant lot)
1208 St. Vincent Street	(residence)
1210 St. Vincent Street	(residence)
St. Agnes Cemetery	(cemetery)
1229-1231 Conkling Ave.	(residence)

Locations of these properties are shown on Figure 2. Access to and on the Site were via existing roads, trails or pathways - no new road construction or major clearing occurred.

3. Site security

Trespass on the Site may result in exposure to potentially hazardous conditions. Therefore, security measures were implemented during the RI to restrict unauthorized entry to the Site. The entry gates were locked at the conclusion of each day and at times when no Site work was being performed. During on-site activities for which they were responsible, representatives from either O'Brien & Gere Engineers, Inc. (O'Brien & Gere) or Harza Northeast of Utica, New York (Harza, as a prime subcontractor to O'Brien & Gere) monitored the Site for unauthorized access. The integrity of the chain link fence surrounding the Site was examined periodically during the RI and repaired as necessary. Locks and chains to resecure the gates were replaced on an "as needed" basis. Maintaining appropriate site security has been an ongoing problem during the RI/FS program period.

4. Contingency procedures

Potentially dangerous conditions could develop during the performance of certain activities associated with the Site. Potentially dangerous conditions present at the Site are physical hazards associated with: the operation of heavy equipment, poor facility illumination and the dilapidated condition of portions of the structure. The Health and Safety Plan (O'Brien & Gere, 1992) describes these conditions and prescribes preventive measures to be implemented by workers engaged in Site activities. As described in the HASP, the Site Safety and Health Officer (SSHO) or his designee was responsible for observing potentially dangerous activities and implementing required mitigating actions during completion of the RI. Several interim remedial measures (IRM) were performed on Site to reduce potentially hazardous conditions. These include the June 15, 1993 installation of an interim structural brace to stabilize the main production building and the April 19, 1994 Site surficial cleanup. The City and NYSDEC were notified of the occurrence of situations observed by O'Brien & Gere which appeared to create hazardous conditions at the Site.

5. Management and organization

The City of Utica retained O'Brien & Gere to perform the RI. Harza was retained as a subcontractor to O'Brien & Gere to provide engineering support. The organizational structure for the RI is described below:

5.1. PRP Group

The City of Utica has authorized the City Engineer to negotiate agreements and act as a point of contact on behalf of the City. Other PRPs declined to participate in the RI/FS process.

5.2. O'Brien & Gere

Dr. Swiatoslaw W. Kaczmar, CIH, of O'Brien & Gere serves as Project Officer. In this role, he is responsible for overall project oversight and administration. Mr. Jeffrey E. Banikowski, CPG, of O'Brien & Gere and Paul Romano of Harza serve as Project Managers, with responsibility for day-to-day management of the project, including monitoring and reporting of progress and preparation of deliverables. Christopher C. Calkins of O'Brien & Gere assisted Mr. Banikowski in the day-to-day aspects of the investigation and may be contacted in the absence of the Project Managers. Other O'Brien & Gere functions, including field operations, are described in the Remedial Investigation Report (RI) (O'Brien & Gere 1994), Feasibility Study Report (FS) (O'Brien & Gere 1995), Quality Assurance Project Plan (QAPP) (O'Brien & Gere 1992), Field Sampling Plan (FSP) and Health and Safety Plan (HASP).

5.3. NYSDEC and NYSDOH

James Reagan serves as NYSDEC Project Manager. In this role, he is responsible for regulatory oversight of the project. Larry Ennist serves as NYSDEC Citizen Participation Specialist for this project. In this capacity, he ensures the public is fully informed with regard to this project. Bob Griffiths serves as NYSDOH Project Manager responsible for overseeing public health decisions regarding this project. In 1993, NYSDEC prepared the Final Citizen Participation Plan and in 1995 NYSDEC prepared the Record of Decision (ROD) and the Proposed Remedial Action Plan (PRAP). These and all other Site documents are stored in a document repository in the Utica City Library and are maintained by the City Clerk's office.

5.4. Subcontractors

O'Brien & Gere retained subcontractors for certain specialized efforts at the Site, as follows:

- Engineering Support - Harza Northeast and Liu Engineers
- Laboratory analysis - H2M Laboratories, Melville, New York.
- Geophysical Survey - Malcolm Pirnie
- Drilling - Environmental Products and Services, Syracuse, New York
- Chemical removal - Clean-Harbors, Natick, Massachusetts.
- Additional Laboratory Analyses - NYSDOH

6. Waste disposal

During completion of the RI, waste streams were generated along with used personal protective equipment (PPE). Waste streams included: soil cuttings and fluids from soil boring and monitoring well installations, ground water from monitoring well development and purging, wash and rinse solutions from sampling equipment decontamination, and disposable materials including personal protective equipment and sampling equipment. Personal protective equipment, such as Tyvek® clothing, protective gloves, and latex gloves, was placed into plastic garbage bags and stored in the production building. Attempts were made to minimize the quantities of waste materials generated during completion of the RI.

Specifics for handling the waste streams are presented below:

- Soil cuttings generated during completion of the soil boring and monitoring well installations were stored in a total of 17 labeled Department of Transportation (DOT) approved 55-gallon solid waste drums and staged inside the production building. Eggen Excavating and Equipment company was contracted to remove and transport the drums to the Oneida County Ash Landfill in Rome, New York. The contractor used a truck mounted crane with a drum sling to lift the drums and empty their contents into a dump truck with a plastic bed liner. A copy of the July 6, 1994 letter from Harza documenting the soil cutting removal and disposal is included as Appendix A.
- Development and purge water from sampling the monitoring wells were contained in 20 labeled DOT approved drums. The drums were staged near the well from which the water was purged. Bob Lynn and Son Septic Tank and Sewer Service was contracted to remove development and purge water and clean the drums. A vacuum truck was utilized to transfer the water from the drums in preparation for transport and disposal at the Oneida County Water Pollution Control Plant in Utica, New York. The empty drums (17 soil cuttings and 20 purge water) were cleaned and transported to the Bossert Site located at 1002 Oswego St in Utica, New York for later use. A copy of the July 6, 1994 letter from

Harza documenting the purge water removal and disposal is included as Appendix A.

- Solid (non-hazardous) waste, including refuse and brush, collected by O'Brien & Gere, Harza NE, City of Utica and NYSDEC during the April 19, 1994 IRM Site surficial cleanup was disposed of by the City of Utica.
- PPE and other disposables were disposed of as solid waste..

7. Conclusions

Based on data supplied by Harza for the soil cuttings and purge water disposal, wastes generated as a result of these activities were appropriately managed and disposed. With regard to future wastes to be generated during remedial construction, NYSDEC will oversee the construction contractor and evaluate compliance with applicable transport and disposal laws and regulations. Waste disposal actions were coordinated with NYSDEC Region 6 Staff and with appropriate staff at each of the disposal facilities. All waste disposal actions were in conformance with applicable federal, state and local regulations.

References

New York State Department of Environmental Conservation: *Proposed Remedial Action Plan - Primoshield Plating Site*; New York State Department of Environmental Conservation, January 1995.

New York State Department of Environmental Conservation: *Record of Decision - Primoshield Plating Site*; New York State Department of Environmental Conservation, March 1995.

O'Brien & Gere, 1992: *Work Plan - Primoshield Remedial Investigation/Feasibility Study*; O'Brien & Gere Engineers, Inc., September 1992.

O'Brien & Gere, 1992: *Health & Safety Plan - Primoshield Remedial Investigation/Feasibility Study*; O'Brien & Gere Engineers, Inc., September 1992.

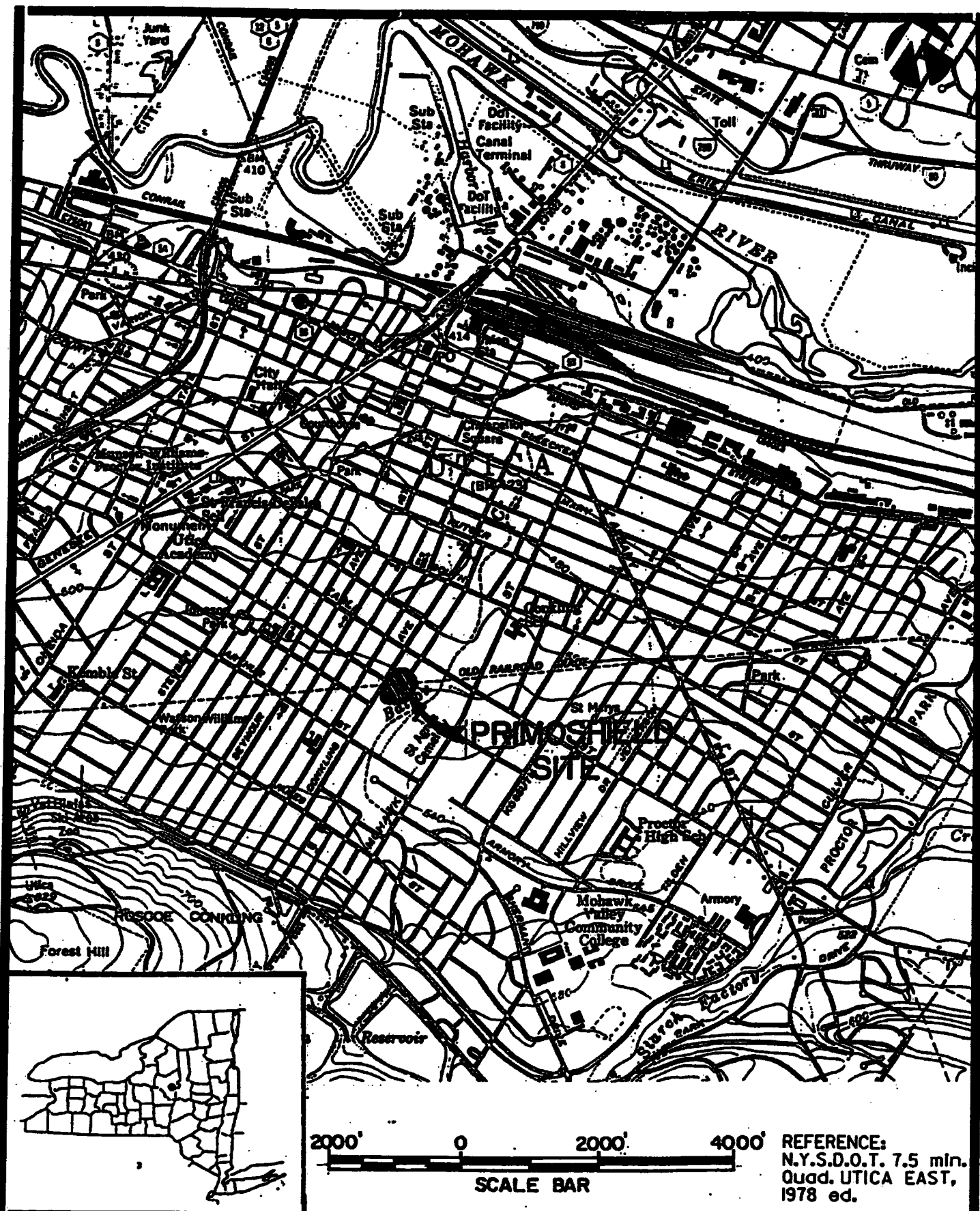
O'Brien & Gere, 1992: *Quality Assurance Project Plan - Primoshield Remedial Investigation/Feasibility Study*; O'Brien & Gere Engineers, Inc., September 1992.

O'Brien & Gere, 1993: *Field Sampling Plan - Primoshield Remedial Investigation/Feasibility Study*; O'Brien & Gere Engineers, Inc., May 1993.

O'Brien & Gere, 1994: *Remedial Investigation Report - Primoshield Remedial Investigation/Feasibility Study*; O'Brien & Gere Engineers, Inc., September 1994.

O'Brien & Gere, 1995: *Feasibility Study Report - Primoshield Remedial Investigation/Feasibility Study*; O'Brien & Gere Engineers, Inc., January 1995.

O'Brien & Gere, 1996: *Primoshield Remedial Design*; O'Brien & Gere Engineers, Inc., April 1996



O'BRIEN & GERE
ENGINEERS, INC.
HARZA

DATE	1-22-98
DRAWN	JC
NO.	6057

SITE LOCATION MAP

FIGURE
1

74	73	72	71	70	69	68	67	66	65	64	63	62	61	60	59	58	57	56
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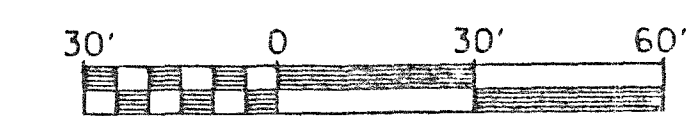
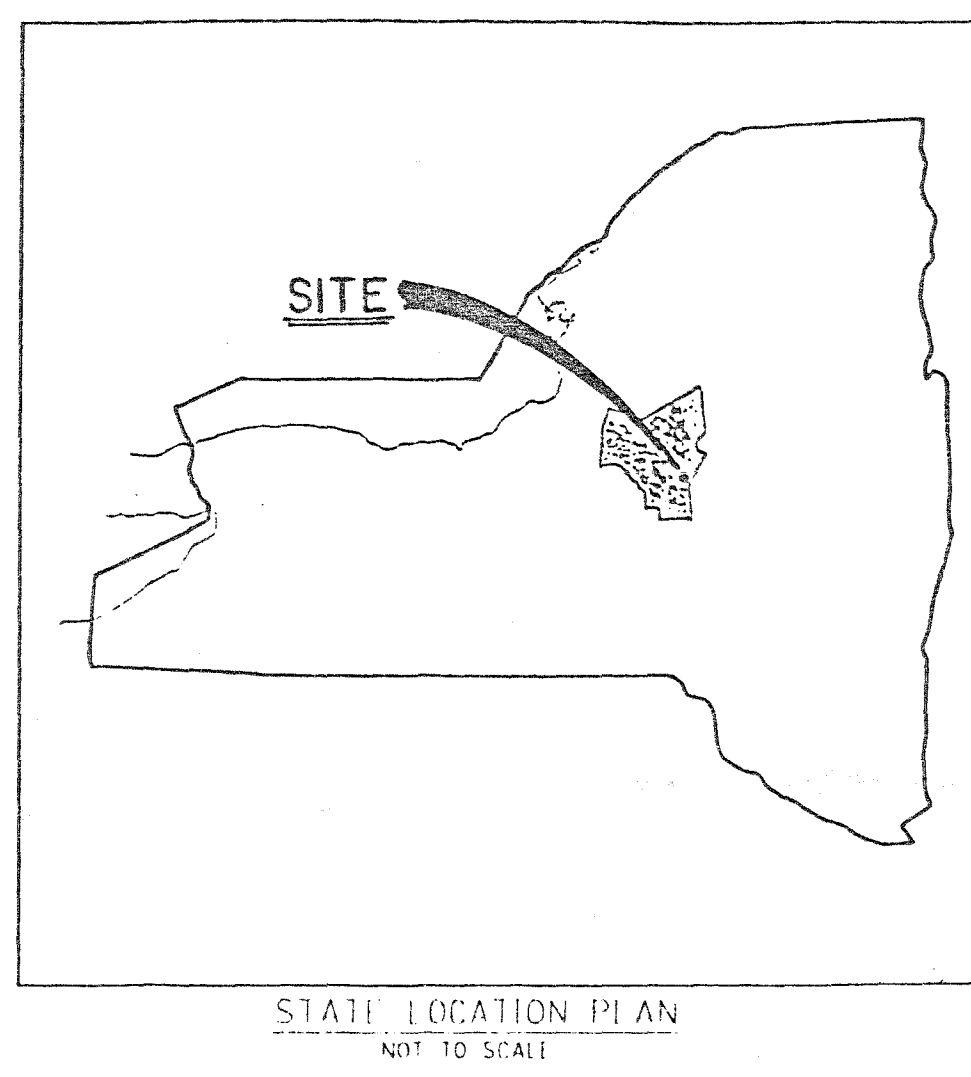


FIGURE 2
SITE AND
SURROUNDING
PROPERTY
OWNERS



Department of Environmental Conservation

6 NYCRR Part 375 Inactive Hazardous Waste Disposal Site Remedial Program

May 1992



New York State Department of Environmental Conservation
MARIO M. CUOMO, Governor THOMAS C. JORLING, Commissioner

1 the person giving notice, a brief description of the proposed
2 substantial change of use, and such other information as the
3 Commissioner shall deem necessary. Notice shall be provided by
4 the person proposing to make a substantial change of use to the
5 site's contact list identified in paragraph 375-1.5(b)(2) of this
6 Part (if any) and adjacent property owners.

7 (Note: This section provides for compliance with
8 ECL 27-1317 only. Nothing in this section relieves any person of
9 the duty to comply also with Public Health Law Section 1389-d,
10 which addresses the obligation to notify the Department of Health
11 of new uses of sites. Nothing in this section relieves any
12 person from any requirement to obtain a permit or other
13 authorization from State, federal, or local governments in order
14 to engage in the new use of site.)

15 375-1.7 Permitting remedial activities.

16 (a) Except as provided in section 375-1.11 of
17 this Part and unless a permit is applied for and issued, when a
18 responsible party for a site develops and implements a program or
19 an IRM in compliance with an order to which section 375-2.1 of
20 this Part is applicable, the Department may exempt a person from
21 the requirement to obtain any permit issuable by the Department
22 for an activity satisfying the criteria set out in subdivision
23 375-1.7(b) of this Part. When the Department develops and
24 implements a program under authority of ECL 27-1313.5, no permit
25 issuable by the Department shall be required for activities
26 satisfying all the criteria set out in subdivision 375-1.7(b) of
27 this Part.

28 (b) The following criteria must be met:

29 (1) The activity is onsite. For purposes hereof,
30 an activity is onsite:

31 (i) if it is conducted on the same premises as
32 the site, or

33 (ii) if it is conducted on different premises that
34 are under common control or are contiguous to or physically
35 connected with the site and the activity manages exclusively
36 waste for which the responsible party is liable; and

37 (2) The activity satisfies all substantive
38 technical requirements applicable to like activity conducted
39 pursuant to a permit as determined by the Department; and

40 (3) The activity is a component of a program
41 selected by a process complying with the public participation
42 requirements of section 375-1.5 of this Part, to the extent
43 applicable.

44 (c) When a responsible party for a site develops
45 and implements a program in compliance with an order to which
46 section 375-2.1 of this Part is applicable, and when the
47 Department develops and implements a program under authority of
48 ECL 27-1313.5, no permit, consent, approval or other
49 authorization under any local government zoning, land-use, or
50 other regulatory program shall be required.
51
52

1 paragraph 375-1.5(b)(2) of this Part a notice and brief analysis
2 of the remedy that the Department proposes to be undertaken at
3 the site, which includes sufficient information to provide a
4 reasonable explanation of that proposed remedy, including but not
5 limited to, a summary of the Department's reasons for selecting
6 it over other alternatives it considered and of the construction
7 and operational requirements of that proposed remedy;

8 (2) provide a 30-day period for submission of
9 written comments and an opportunity for submission of oral
10 comments at a public meeting at or near the site. The Department
11 shall summarize the comments received at the public meeting and
12 make the summary available to the public; and

13 (3) mail to those on the list described in
14 paragraph 375-1.5(b)(2) of this Part and make available to the
15 public a notice and brief analysis of the remedy selected for
16 implementation that includes a discussion of any significant
17 changes from the proposed remedy as made available under
18 paragraph 375-1.5(c)(1) of this Part, and a response to each of
19 the significant comments, criticisms, and new data submitted to
20 the Department.

21 (d) All items developed under this section,
22 including comments received from the public and a summary of the
23 public meeting, will be made available for public inspection and
24 copying in the repositories described in paragraph 375-1.5(b)(3)
25 of this Part.

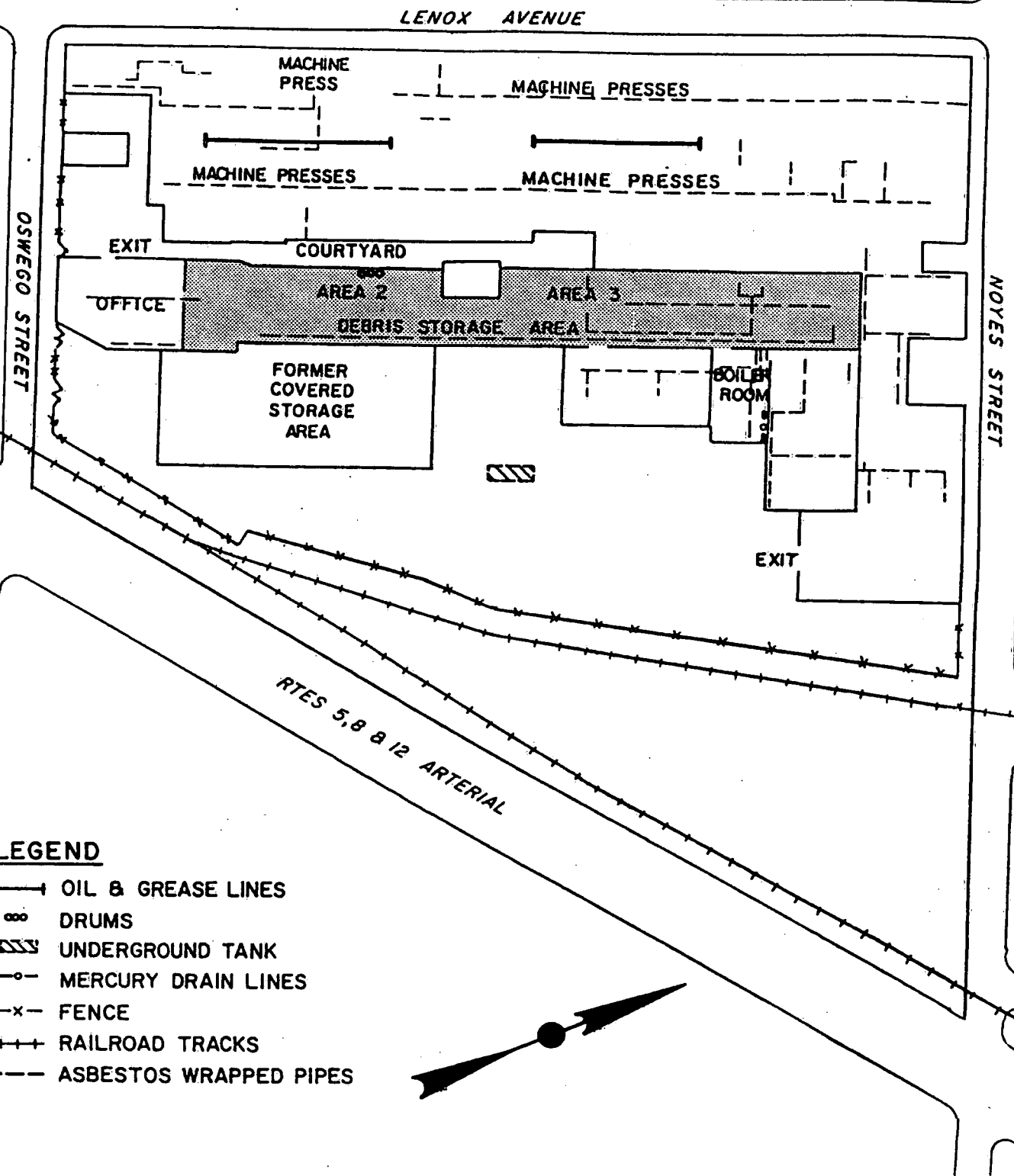
26 (e) This section applies to all programs, whether
27 to be implemented by the Department or by a person acting under
28 order issued under authority of ECL Article 27, Title 13, whether
29 after hearing or on consent.

30 (f) An IRM, whether implemented by the Department
31 or by a person acting under order pursuant to section 375-2.1 of
32 this Part either after hearing or on consent, is exempt from the
33 comprehensive public participation requirements of subdivisions
34 375-1.5(b) and 375-1.5(c) of this Part. However, the Department
35 or such person implementing the IRM or making the request will
36 conduct such public participation activities as the Department
37 deems necessary and appropriate under the circumstances.

38 375-1.6 New use of sites.

39 (a) At least 60 days before the start of physical
40 alteration or construction constituting a substantial change of
41 use of a site listed in the Registry, or at least 60 days before
42 a substantial change of use of a site listed in the Registry not
43 involving any physical alteration or construction, as the case
44 may be, the person proposing to make a substantial change of use
45 shall give notice thereof.

46 (b) Such notice must be given in writing
47 addressed to the Commissioner at 50 Wolf Road, Albany, New York
48 12233 and to the clerks of the county; the town or city (as the
49 case may be); and (where located in one) the village, within
50 which the site is located and must include an identification of
51 the site by means of its Registry number, an identification of
52



LEGEND

- |— OIL & GREASE LINES
- ∞ DRUMS
- ▨ UNDERGROUND TANK
- MERCURY DRAIN LINES
- x— FENCE
- +++ RAILROAD TRACKS
- ASBESTOS WRAPPED PIPES

SCALE APPROX. 1 IN = 115 FT



O'BRIEN & GERE

Stetson-Harza
A LINCOLN COMPANY

DATE

DRAWN LRM

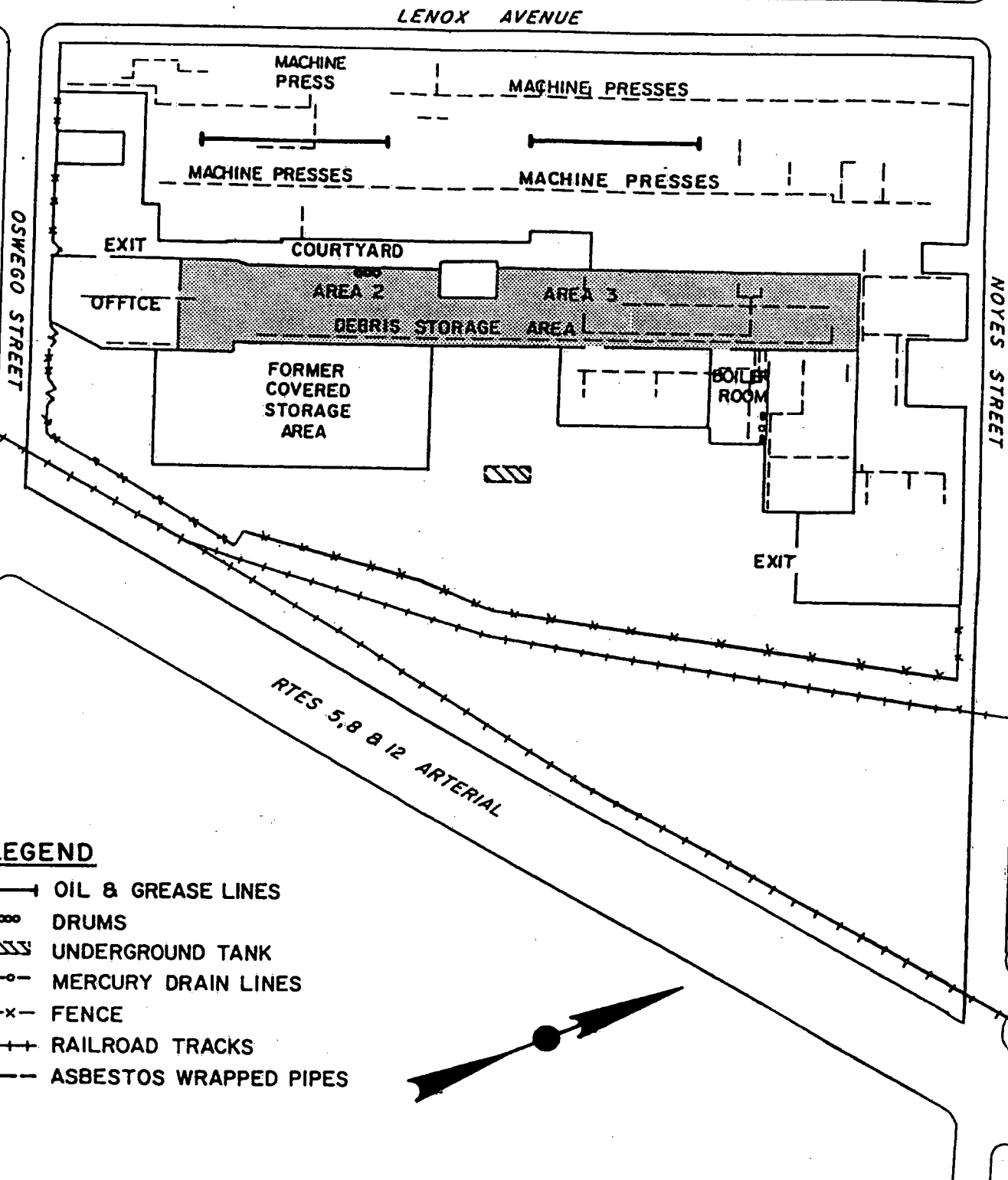
NO. 6057

BOSSERT MANUFACTURING
PLANT SITE REMEDIATION

SITE PLAN

FIGURE

3



LEGEND

- |— OIL & GREASE LINES
- ∞ DRUMS
- ▨ UNDERGROUND TANK
- MERCURY DRAIN LINES
- x— FENCE
- +++ RAILROAD TRACKS
- ASBESTOS WRAPPED PIPES

SCALE APPROX. 1 IN = 115 FT



O'BRIEN & GERE

Stetson-Harza
A LINCOLN COMPANY

DATE

DRAWN LRM

NO. 6057

BOSSERT MANUFACTURING
PLANT SITE REMEDIATION

SITE PLAN

FIGURE

3

**Soil cutting and purge water disposal
documentation**

**Primoshield Site: 6-33-027
Waste Management Plan
January 1998**

Stetson-Harza
A LIARZA COMPANY

181 Genesee Street
Utica, New York 13501-2168
(315) 797-5800
FAX: (315) 797-8143

July 6, 1994

Mr. James Reagan
New York State Department of
Environmental Conservation
Bureau of Hazardous Site Control
Division of Hazardous Waste Remediation
50 Wolf Road
Albany, NY 12233-7010

Re: Primoshield Drill Cuttings
and Development Water Removal
Stetson-Harza No. 6057

Dear Mr. Reagan:

Enclosed as Exhibit A are copies of all permits and invoices regarding the disposal of drill cuttings and development/decon water from the Primoshield site.

Soil cuttings from Primoshield drilling activities were removed from the site on April 15, 1994. The cuttings were contained in 17 55 gallon drums, stored in the production building. Eggan Excavating and Equipment Company was contracted to remove the soil and transport it to the Oneida County Ash Landfill in Rome, New York.

The contractor used a truck mounted crane with a drum sling to lift the drums and empty their contents into a dump truck with a plastic bed liner. Drums were staged in the northeast corner of the site for future cleaning.

The development and decon water was removed from the site on June 7, 1994. The water was contained in 20 55 gallon drums located throughout the Primoshield property. Bob Lynn and Son Septic Tank and Sewer Service was contracted to remove the water and clean drums on site then transport the 37 empty drums to the Bossert site. The water was transported to the Oneida County Water Pollution Control Plant in Utica, New York.

The contractor used a vacuum truck to remove water from the drums and a pressure washer to clean the drums. After cleaning the drums, the contractor transported the drums to the Bossert facility and stored them in area #7.

Exhibit B is a photo log of the development/decon water and drum removal from the site. Mr. Brad Phillips, of Stetson-Harza, provided contractor oversight during the work.

Very truly yours,

John J. Brady, P.E.

JJB/rrb
Enclosures

cc: J. Banikowski, O'Brien & Gere

ONEIDA - HERKIMER SOLID WASTE AUTHORITY

1 Turner Street Suite 401, Utica, New York 13501

(315) 733-1224

(315) 866-6592

David H. Link, Chairman

Charles P. Patterson, Vice Chairman

Harry A. Hertline, Treasurer

Gerald C. Brodock

R. W. Burrows, Jr.

Louis R. Critelli

James M. D'Onofrio

Barbara Freeman

Robert McLaughlin

Guy Wilcox, M.D.

Mark C. Arnold, Executive Director
Jodi M. Tuttle, Authority Secretary

April 15, 1994

Mr. John Eggan
Eggan Excavating and Equipment
7449 Townline Road, RD #7
Rome, NY 13440

Dear Mr. Eggan:

Enclosed please find a copy of the letter of approval from the NYS DEC regarding the disposal of the contaminated soil from the Primoshield site in Utica, NY. The State DEC has approved the soil to be taken to the Oneida County Ash Landfill. The soil must be emptied from drums. This approval is for soil only.

Please let me know the day you wish to haul. Feel free to call if you have any questions.

Sincerely,

William A. Rabbia
William A. Rabbia
Recycling Coordinator

Enclosure

New York State Department of Environmental Conservation

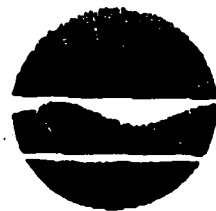
207 Genesee Street

Utica, New York 13501-2885

(315) 793-2554

RECEIVED

SEP 28 1993



Thomas C. Jorling
Commissioner

Oneida County Waste
Management Authority

September 24, 1993

Mr. William A. Rabbia
Environmental Compliance Coordinator
Oneida-Herkimer Solid Waste Authority
311 Turner Street, Suite 401
Utica, New York 13501

Re: Contaminated Soil from an Automobile Accident and Soil Cuttings from Primoshield
Utica (C), Oneida County

Dear Mr. Rabbia:

This Department has received your September 13, 1993 letters for the above-referenced projects requesting permission to take the contaminated soil to the Oneida County Ash Landfill on Tannery Road, Rome, New York. Based upon our review of the accompanying sample results, the material has been determined to be non-hazardous. Both the contaminated soil from the automobile accident and the soil cuttings from the Primoshield site can be taken to the Oneida County Ash Landfill.

If you have any questions concerning this matter, please feel free to call.

Sincerely,

Robert J. Senior

Robert J. Senior, P.E.
Environmental Engineer 2
Region 6 - Utica

RJS:dal

cc: John Kenna

**EGGAN EXCAVATING
AND EQUIPMENT CO.**
7449 Townline Road, RD 7 Box 65
ROME, NEW YORK 13440.
(315) 339-1847

SOLD BY <u>T. D. Egan</u>		DATE <u>April 15, 1994</u>	
NAME <u>Stetson - Hertz</u>			
ADDRESS <u>St. Vincent St</u>			
<u>181 Genesee St</u>			
<u>Utica New York 13501</u>			
1	Crane Truck		
1	Dump Truck		
	USED TO Clean		
	Dumps At		
	Site		
	R.O. No. 19190		500.00
RECEIVED BY <u>Bill Dillip</u>		S: H	

2965

Thank You

All claims and returned goods MUST be accompanied by this bill.

EGGAN EXCAVATING & EQUIPMENT CO.

7449 Townline Road RD #7
ROME, NEW YORK 13440
(315) 339-1847

CUSTOMER'S ORDER NO.		PHONE		DATE	
		797-5800		April 15, 1994	
NAME					
Stetson-Harza Attn. Brad Phillips					
ADDRESS					
181 Genesee Street					
Utica New York 13501					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	NOSE RETD.
J.P.E.					
QTY.	DESCRIPTION			PRICE	AMOUNT
	This bill represents the charges for moving Contaminated soil from The Primoshield site in Utica, N.Y. to the Oneida County Ash Landfill in Rome, New York.				
	Your P.O. Number is 19190				
	Our D.E.C. Haulers Permit is 6A120				
	Our Oneida County Permit is 180				
	Our Proposal Price is			\$ 500.00	
	Oneida County Landfill Fee			\$ 430.32	
	Supporting Documents Enclosed				
	Total			\$ 930.32	
	New York State Sales Tax			TAX \$ 74.43	
RECEIVED BY				TOTAL	\$ 1004.75

0170

All claims and returned goods
MUST be accompanied by this bill.

Thank You

EGGAN EXCAVATING & EQUIPMENT CO.
7449 Town Line Road RD #7 Box 65
ROME, NEW YORK 13440

800-527-6040

INVOICE NO.

00170

INVOICE DATE

04/15/94

STETSON

STETSON-HARZA
ATTN: MR. BRAD PHILLIPS
151 GENESEE STREET
UTICA, NEW YORK 13501

ORDER NUM: P.O. #19190 ORDERED: 04/15/94 PAYMENT DUE: 05/15/94

TERMS: NET 30

REFERENCE	DESCRIPTION	AMOUNT
04/15/94	<p>P.O. #19190 INVOICE #0170 SITE: PRIMOSHIELD, UTICA, NEW YORK</p> <p>THIS BILL REPRESENTS THE CHARGES FOR MOVING CONTAMINATED SOIL FROM THE PRIMOSHIELD SITE TO THE ONEIDA COUNTY ASH LANDFILL LOCATED IN ROME, NEW YORK.</p> <p>OUR D.E.C. HAULER PERMIT NUMBER IS 6A-120. OUR ONEIDA COUNTY PERMIT NUMBER IS 120.</p> <p>BID PRICE. ONEIDA COUNTY INVOICE #94002858 FOR DISPOSAL.</p>	<p>800.00 430.32</p>
RECEIVED		
APR 19 1994		
STETSON-HARZA		
SUBTOTAL		930.32
TAX		74.43
TOTAL		1,004.75

311 Turner Street, Suite 401, Utica, NY 13501
(315) 733-1224 (315) 866-6592
FAX (315) 733-2305

RECEIPT DOCUMENT NUMBER

94002858

B 180
EGGAN EXCAVATING AND EQUIP. CO
7449 TOWNLINE ROAD
RD #7
ROME NY 13440

H 180
EGGAN EXCAVATING AND EQUIP. CO
7449 TOWNLINE ROAD
RD #7
ROME NY 13440

DATE	ENTRY TIME	OPERATOR	EXIT TIME	OPERATOR	GROSS WEIGHT	TARE WEIGHT	NET WEIGHT
04/15/94	14:04	APK	14:57	APK	10.8700	5.9800	4.8900
20025970	Scale 01		Scale 01		(21740 LB)	(11960 LB)	(9780 LB)

VEHICLE NUMBER	VEHICLE TYPE	PLATE NUMBER	TRANSACTION TYPE
180.03	Dump	MB7566	Normal

QUANTITY	DESCRIPTION/ORIGIN	UNITS	UNIT PRICE	AMOUNT
4.8900	E030 CONTAMINATED SOIL ONEIDA COUNTY ALL MUNICIPALITIES <i>St Vincent St Utica N.Y. Stetson Harza</i>	TONS	88.00	430.32

I hereby certify that the information provided on this form is true to the best of my knowledge.

DRIVER NAME

PRINT

SIGNATURE

Mark D. Gagne

DOCUMENT
TOTAL

430.32



Raymond A. Meier
County Executive

ONEIDA COUNTY DEPARTMENT OF
WATER QUALITY AND WATER POLLUTION CONTROL
P.O. Box 442, Utica, New York 13503-0442
(315) 798-5656

April 29, 1994

ATTN: MR. JOHN ZEGARELLI
CITY OF UTICA ENGINEERING DEPT
1 KENNEDY PLAZA
UTICA NY 13502

Re: Primoshield

Dear Mr. Zegarelli:

In response to Brad Phillips's Telcon of April 27, 1994, enclosed is a renewed hauled waste generator permit for Non-Hazardous Wastes from the Primoshield Hazardous Waste Remediation Site, located at 1212 St. Vincent Street, Utica NY.

The initial approval is for approximately 825 gallons of well drilling & development wastewater described in Ms Pat Rosato's letter dated July 22, 1993, and data tables dated July 12, 1993. The delivery of additional wastestreams generated at this site is prohibited without specific OCSD approval. During early stages of remediation projects, the OCSD performs waste evaluation and gives approval on an individual case basis.

Sincerely,

R.D. HOFFMAN
Industrial Wastes Chemist
Oneida County Sewer District

cc: Brad Phillips, Stetson-Harza

RECEIVED

MAY - 3 1994

STETSON-HARZA

Oneida County Sewer District
Waste Generator Permit No. G-018

In accordance with all terms and conditions of the Oneida County Public Works Sewer Rules and Regulations, Article XI, Terms and Conditions for the Issuance of Permits, Section 111, et seq., and also with any applicable provisions of Federal, State, or County law or regulation,

PERMISSION IS HEREBY GRANTED TO:

Generator Name: CITY OF UTICA
MR. JOHN ZEGARELLI
Address: 1 KENNEDY PLAZA
UTICA NY 13502
Telephone: (315)-792-0152

Site Name: PRIMOSHIELD, INC.
Address: 1212 ST. VINCENT STREET
UTICA NY 13501

Eng. Consultant: STETSON-HARZA
Contact: BRAD PHILLIPS
Address: 181 GENESEE STREET
UTICA NY 13501-2168
Telephone: (315)-797-5800

Hauler Name : BOB LYNN & SON SEPTIC SERVICES
Contact: ROBERT LYNN
Address: RR1 BOX 153F
UTICA NY 13502
Telephone: (315)-735-1550
NYSDEC Permit #: 6A-164

for generating the wastes specified below, having the wastes hauled by a NYSDEC Part 364 Permitted Waste Transporter, and discharging only into the Hauler Control Manhole located at the Oneida County Water Pollution Control Plant, 80 Leland Avenue, Utica, New York.

Waste Description & Source:

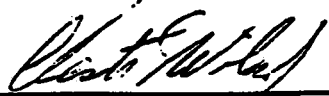
OTHER MISCELLANEOUS INDUSTRIAL WASTES - CODE N899: Non-Hazardous Wastes approved by the OCSD on a case by case basis, generated at the Primoshield Site, Utica NY. See Special Permit Conditions #13.

This permit is granted in accordance with the NYSDEC Part 364 Waste Transporter Permit application and related information filed with the Commissioner, Oneida County Water Quality & Water Pollution Control, together with the following named conditions and requirements.

Permit Modification Tracking System:

Original Permit: 08-05-93
Renewal Date: 04-29-94
Expiration Date: 10-31-94

Signature: _____


CHESTER S. WILCZEK
Commissioner, Water Quality
& Water Pollution Control

General Conditions for Acceptance of Hauled Wastes:

1. The Hauler must possess a current NYSDEC Part 364 Waste Transporter Permit that is valid for the specific type of waste hauled. The OCSD must be provided with a copy of the current applicable permit.
2. The wastes must be discharged only into the Designated Hauler Drop Manhole located west of the Raw Waste Building.
3. All deliveries must be made on Monday through Friday between 6:00 A.M. and 8:00 P.M. from April 1 through October 31; and between 6:00 A.M. and 6:00 P.M. from November 1 through March 31.
4. Prior to discharge all drivers must sign in and enter information on the haulers waste tracking system record sheet. Information required includes the name and address of the waste source, and the number of gallons of wastewater delivered. OCSD personnel will periodically sample truckloads for chemical analysis.
5. The OCSD does not accept RCRA Listed or Characteristic Hazardous Wastes. This includes a requirement that the waste be non-hazardous as defined by maximum contaminant concentrations of the Toxicity Characteristic Leaching Procedure (TCLP) Regulation [40 CFR 261.24, Table 1]. In addition, the OCSD does not accept wastes for which a Hazardous Waste Transport Manifest is required by the NYSDEC.
6. Prohibited wastes include all industrial and non-household wastes that have not been specifically approved by OCSD.
7. Prohibited wastes include grit and sand; to ensure that the waste does not contain grit or sand, the volatile solids content must be greater than 40.0% on a dry weight basis, and the total solids content must not exceed 6.0%.
8. Approval to discharge non-household wastes is done on a specific source and individual case basis, and will be noted under Item 13, Special Permit Conditions. This includes, but is not limited to, landfill leachate and industrial wastewater.
9. Co-mingling of different types of wastes is prohibited.
10. Federal RCRA and Clean Water Act regulations prohibit the discharge of hauled wastes during periods of treatment plant upset. The OCSD reserves the right to suspend deliveries in order to comply with these regulations.
11. The OCSD unconditionally reserves the right to amend or rescind this approval without prior notice.

12. Charges and Billing Procedures:

Generators of Non-Domestic Wastes are directly billed by the OCSD. The bill is based on the quantity of wastes delivered as recorded by the Hauler on the sign-in sheet. The Non-Domestic Wastes rate for 1994 is \$0.08/gallon. If rate changes occur, notification will be sent.

The OCSD will bill the City of Utica for wastewater hauled from the Primoshield site to the OCSD Plant. Bills are assessed monthly.

13. Special Permit Conditions:

The OCSD approves delivery of the Non-Hazardous Wastes specified in this Permit, classified as OTHER MISCELLANEOUS INDUSTRIAL WASTES, CODE N899, from the Primoshield Hazardous Waste Cleanup Site in Utica NY. The delivery of additional wastestreams generated at this site is prohibited without specific OCSD approval.

13A Permitted Wastes Include:

- 1) Approximately 825 gallons of well drilling & development waste water from the Stetson-Harza Remedial Investigation/Feasability Study (RI/FS) project as described in the Stetson-Harza letter dated 7-22-93 and data tables dated 7-12-93. The analytical data provided show compliance with the pollutant limits specified below.

13B Pollutant Limits:

Primoshield was a plating facility, and its process wastewater was subject to the Metal Finishing Regulation. Please note that a combination of pollutant limits based on the TCLP Regulation (40 CFR 261.24), Metal Finishing Regulation (40 CFR 433), and the Oneida County Sewer Rules & Regulations, is applicable to contaminated groundwater hauled from the site. These limits are presented in Table 1.

TABLE 1: Pollutant Limits for the Primoshield Site Wastewater based on the TCLP Regulation, Metal Finishing Regulation, and the Oneida County Sewer Rules & Regulations. In case of regulatory conflict, the more stringent limit set is applicable (highlighted in bold type).

POLLUTANT PARAMETER	OC-SR&R	METAL FINISHING		RCRA TCLP LIMIT
	DAILY MAXIMUM LIMIT	DAILY MAXIMUM LIMIT	MAXIMUM MONTHLY AVERAGE	
pH Range	5.0-10.0			
Cadmium, mg/L	8.0	0.69	0.26	1.0
Chromium, mg/L	4.0	2.77	1.71	5.0
Copper, mg/L	3.0	3.38	2.07	---
Lead, mg/L	10.0	0.69	0.43	5.0
Nickel, mg/L	3.0	3.98	2.38	---
Silver, mg/L	2.0	0.43	0.24	5.0
Zinc, mg/L	10.0	2.61	1.48	---
Cyanide Total, mg/L	1.0	1.20	0.65	---
TTO Organics, mg/L		2.13		*

* See TCLP Regulation for specific organic substances.

13C Self-Monitoring & Reporting Frequency:

During initial stages of the cleanup, the OCSD requires the Permittee to submit analytical data for each batch or type of wastewater proposed for hauling to the OCSD.

The monitoring and reporting frequency may be reduced at a later date. As a minimum, the OCSD requires the Permittee to submit semi-annual self-monitoring and project status reports; the due dates are May 31 & November 30 of each year.

13D Analytical Methods & Requirements:

- 1) Perform a TCLP Scan for all parameters except Volatile Organics. The EPA 624 GC/MS Method is substituted for the TCLP Volatile Organic scan as described in (2) below.
- 2) Perform a Clean Water Act (CWA) Total Toxic Organics (TTO) Volatile Organic Scan using the EPA 624 GC/MS Method or EPA 8240 GC/MS Method.

The EPA 624 Method provides analyses for 32 volatile organic compounds, including 9 of the 10 volatile organic compounds determined by the TCLP Extract Volatile Organic scan. Methyl ethyl ketone (MEK) is the only TCLP volatile organic substance that is not measured by the EPA 624 Method.

- 3) Perform a CWA-TTO Base Neutral/Acid Extractable Scan using the EPA 625 GC/MS Method or EPA 8270 GC/MS Method.
- 4) Perform a CWA-TTO Pesticide Scan using the EPA 608 Method.
- 5) Perform a Total Cyanide analysis.
- 6) Perform analyses for Non-TCLP Metals Copper, Nickel & Zinc.

14. Permit Renewal:

At the time of annual renewal of the NYSDEC Part 364 Waste Hauler Permit, the Oneida County Sewer District Waste Hauler Permit will be re-issued automatically on an annual basis to haulers delivering wastes to the Oneida County Water Pollution Control Plant. Included in the permit will be the new billing rates, and any additional conditions determined to be necessary by the Commissioner of Water Quality & Water Pollution Control.

15. Warning Notice:

County law provides for Fines, Penalties and/or Permit Revocation for failure to follow any of the conditions of this Permit.

BOB LYNN & SON
 Septic Tank & Sewer Service
 RR 1 Box 153F
 UTICA, NEW YORK 13502
 (315) 735-1550

CUSTOMER'S ORDER NO.		PHONE		DATE	
		1797-5800		6/7/94	
NAME					
Stetson - Hays					
ADDRESS					
181 Seneca St.					
City, State, Zip					
Utica, NY 13501					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE. RETD.
QTY.	DESCRIPTION			PRICE	AMOUNT
	Pump & wash drums				
	at Primschield				300.00
	Transport empty				
	drums to Basin				150.00
					450.00
Thank you					
RECEIVED					
RECEIVED BY				TAX	36.00
JUN 14 1994				TOTAL	486.00

All claims and returned goods
 MUST be accompanied by this bill.

5000

Thank You

WASTE TRANSPORTER PERMIT

Pursuant to 6 NYCRR Part 364

No. of Additional Sheets Attached

02

PERMIT NUMBER

EPA TRANSFER ID NUMBER

VEHICLE STATE & LICENSE NUMBER

04-11-

SEE LIST OF VEHICLES

THIS IS TO CERTIFY THAT:

BUSINESS NAME

JOE LYNN JOE LYNN SERVICES

MAILING ADDRESS

Rt. 1 Box 1

CITY

TULSA

COUNTY

HOKKIMER

STATE

NY

ZIP CODE

13502

Having complied with the provisions of the Environmental Conservation Law Titles 3 and 15, of Article 27, is hereby authorized to engage in waste transporting within the State of New York in the manner described herein.

TYPE OF WASTE AND LOCATION OF TREATMENT, STORAGE OR DISPOSAL FACILITY

CONDITIONS: WASTE TO HOKKIMER CO IS GREASE TRAP FROM HOKKIMER CO ONLY.

WASTE TO HOKKIMER CO POTW IS WASTE FROM BRIDGEWATER DUGFOOD CO;
NON-HAZARDOUS WELL DRILLING & DEVELOPMENT WASTEWATER
HAZARDOUS WASTE CLEANUP SITE.

***** END OF CONDITIONS *****

PAGE 2 OF 3 PAGES

THIS PERMIT WILL EXPIRE AT MIDNIGHT

OCTOBER

31

94

and is subject to revocation at any time. This permit is not transferrable

I, the undersigned, the Department of Environmental Conservation has caused this permit to be executed on this

20

day of

MAY

19

94

By Arlene Schmidt
New York State Department of Environmental Conservation Representative

NOT: This permit does not relieve the transporter of the responsibility of complying with any other applicable laws, rules, regulations or orders. Please refer to warning notice on back of this Permit.

**Waste Disposal
Documentation Photos**

EXHIBIT B

**Primoshield Site: 6-33-027
Waste Management Plan
January 1998**



Photo 1: Removing development water near P-107
Date: June 7, 1994



Photo 2: Removing decon water in Production Building
Date: June 7, 1994



Photo 3: Cleaning drums on site
Date: June 7, 1994



Photo 4: Cleaning drums near P107
Date: June 7, 1994



Photo 5: Loading drums for transport to Bossert
Date: June 7, 1994



Photo 6: Unloading drums at Bossert
Date: June 7, 1994